



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

Clifford A. Schulman, Treasurer  
Greenberg, Traurig, Hoffman, Lipoff, Rosen &  
Quentel, P A Political Action Committee  
1221 Brickell Avenue  
Miami, FL 33121

**JAN 16 2002**

Identification Number: C00266585

Reference: October Monthly Report (9/1/01-9/30/01)

Dear Mr. Schulman:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report discloses a transfer(s) to what appears to be a non-federal account of your committee. Please be advised that committees that make disbursements in connection with federal and non-federal elections and have established separate federal and non-federal accounts, must allocate their expenses pursuant to 11 CFR §§106.5 and 106.6. Please provide further clarification regarding this transfer(s). The Commission recommends that you take steps to correct any non-compliance, and that you establish procedures to ensure future compliance with the allocation regulations.

-The totals listed on Lines 23 and 29, Column B of the Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Commission Regulations require that a committee disclose the

identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up, stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on

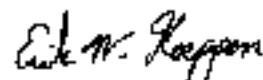
GREENBERG, TRAURIG, HOFFMAN, LIPOFF, ROSEN & QUENTEL, P A  
POLITICAL ACTION COMMITTEE  
PAGE 3

demonstrating "best efforts," please refer to the Campaign Guide.

-The identification of each contributor, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry inadequately identified as "Boston", "Fort Lauderdale", "Los Angeles", "Miami", "New York #1", "New York #2", "New York #3", "Philadelphia", "Phoenix", "Tallahassee", "Washington DC", "West Palm Beach", and "Wilmington".

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,



Erik W. Koeppen  
Reports Analyst  
Reports Analysis Division

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for ensuring the integrity of the financial system and for providing a clear audit trail. The document also highlights the need for transparency and accountability in all financial dealings.

In the second part, the focus shifts to the role of the regulatory body in overseeing the financial system. It outlines the various responsibilities of the regulator, including monitoring market activity, enforcing rules, and providing guidance to market participants. The document stresses the importance of a strong and independent regulatory framework to ensure the stability and confidence of the financial system.

The third part of the document addresses the challenges faced by the financial system in the current environment. It discusses the impact of global economic conditions, technological advancements, and changing market dynamics. The document also identifies key areas for improvement and proposes strategies to address these challenges, such as enhancing risk management practices and improving the efficiency of the financial system.

Finally, the document concludes with a statement of commitment to the principles of transparency, accountability, and integrity. It expresses the confidence that the financial system is well-positioned to meet the challenges ahead and to continue to provide a stable and secure environment for all participants.